

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SMARTMATIC USA CORP.,
SMARTMATIC HOLDING B.V., AND
SGO CORPORATION LIMITED,

Plaintiffs,

v.

HERRING NETWORKS, INC., D/B/A
ONE AMERICA NEWS NETWORK,

Defendant.

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) Case No. _____
)
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)

) CASE PENDING IN DISTRICT OF
) COLUMBIA:
) Civil Action No. 1:21-cv-02900-CJN
)
)

**NOTICE OF OAN’S MOTION TO COMPEL
THIRD PARTY SEC NEWGATE US LLC
TO COMPLY WITH RULE 45 SUBPOENA**

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 45(d)(2)(B)(i), Defendant Herring Networks, Inc., d/b/a One America News Network (“OAN”), by counsel, respectfully submits this Motion to Compel Third Party SEC Newgate US LLC (“SEC Newgate”) to Comply with Rule 45 Subpoena. The reasons and authorities in support of this motion are set forth in the Memorandum of Law attached hereto and incorporated by reference.

WHEREFORE, OAN, as set forth in the attached Memorandum, respectfully moves the Court to compel SEC Newgate to respond to OAN’s document subpoena within 7 days of the granting of this Motion, and to grant OAN all other appropriate relief.

Dated: November 21, 2023

By: /s/ Joel R. Glover

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